REMARKS/ARGUMENTS

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. By this Amendment, original claims 90-107 have been amended and claim 108 has been canceled. Thus, claims 90-107 are pending for further examination.

With respect to the claim objections and rejections under 35 USC 112, second paragraph, the amendments herein are believed to have overcome these objections and rejections. Thus, withdrawal of these objections and rejections is respectfully requested.

Claims 90-108 have been rejected under 35 USC 103(a) as being obvious over Liaw in view of Maggioncalda and the Examiner's Official Notice. In response, the claims have been amended herein in order to more clearly and patentably distinguish the cited references. Thus, reconsideration and withdrawal of this rejection are respectfully requested.

In particular, the claims have been amended to define a financial scenario model creation and analysis tool that provides computer-aided design for financial transactions. The tool includes a graphical user interface which enables a user of the tool to create a diagram of a financial scenario conceived by the user on a display screen, wherein the graphical user interface enables creation of the financial scenario diagram by enabling said user to: 1) define parties involved in the financial scenario and add the parties to the diagram on the display in the form of graphical party objects; and 2) define financial instruments involved in the financial scenario and add the financial instruments to the

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diagram in the form of graphical financial objects that each show a physical connection

on the diagram between pairs of said graphical party objects in the diagram, wherein the

user interface further enables the user to indicate a flow direction on the diagram between

the pairs of said graphical party objects for an obligation related to the financial

instrument connecting said pairs. The tool further includes a software engine operable, in

response to creation of the diagram of the financial scenario, to create a mathematical

model for said financial scenario using data collected by said engine during the creation

of said diagram by said user, wherein creation of said mathematical model includes

creating variables and mathematical relationships between variables based on the content

of the diagram. In addition, the diagram and the mathematical model are linked within

the tool, and the user interface enables the user to make changes to the graphical party

objects and the graphical financial objects in said diagram, wherein when changes are

made by the user to the diagram corresponding changes are made by the software engine

to the mathematical model. The user interface enables said user to perform an analysis of

the financial scenario using the created mathematical model by changing values for the

created variables within the mathematical model and viewing a result determined by the

mathematical model. In this way, the tool enables CAD model creation and analysis for a

wide range of financial applications in a convenient and advantageous manner that has

not heretofore been available in the prior art.

None of the references of record teach or suggest the specific combination of

features set forth in amended independent claim 90, nor any of the amended dependent

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claims 91-107. There is no disclosure or suggestion in Liaw of creating a diagram of a financial scenario and having a software engine generate a mathematical model of the financial scenario based on the diagram. The screen objects discussed at column 6, lines 55+ do not meet this limitation, as there is no disclosure of using the screen objects to represent a financial scenario or generating a mathematical model based on the contents of the screen objects. Liaw is directed to an improved spreadsheet and does not enable mathematical models to be created based on a diagram of a financial scenario, as required by the pending claims.

Maggioncalda fails to make up for the deficiencies of Liaw. Maggioncalda does not enable a financial model to be created, including variables and relationships between variables. Instead, the financial model is pre-existing within the software of Maggioncalda and the user is limited to manipulating the variables and viewing various results of the pre-existing model. Thus, unlike the claimed invention, Maggioncalda is limited to a specific mathematical model and does not enable mathematical models to be created by creating a diagram of a financial scenario conceived by the user on a display. Thus, Maggioncalda simply provides an analysis tool based on a pre-set model, not a model creation and analysis tool as claimed.

The Examiner's Office Notice also fails to provide support for the rejection, or make up for the deficiencies of Liaw and Maggioncalda. Applicant does not dispute that it is known to create diagrams of financial scenarios in order to provide visual depictions of a business arrangement. However, none of the cited references teach a system that

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enables visual depictions to be automatically converted to a mathematical model of the depicted financial scenario, which is a primary aspect of the claimed invention.

For at least the foregoing reasons, Applicant respectfully submits that the cited combination of references fails to establish a *prima facie* case of obviousness for any of the pending claims. Thus, without the improper use of hindsight reconstruction, using the teachings of the instant application, the pending claims are not rendered obvious by the cited references. Accordingly, allowance of amended independent claim 90 is respectfully requested.

With respect to amended dependent claims 91-107, these claims also include numerous features not disclosed in the cited references. Thus, in addition to being allowable based on their dependency on claim 90, these claims are also allowable based on the further patentable limitations contained therein. For example, the Examiner has failed to identify any teaching or suggestion in any of the cited references regarding the non-cell based calculation interface of claim 101.

In view of the foregoing amendments and remarks, Applicant respectfully submits that all of the pending claims clearly and patentably distinguish the prior art of record and are in condition for allowance. Thus, withdrawal of the rejections and passage of this case to issuance at an early date are earnestly solicited.
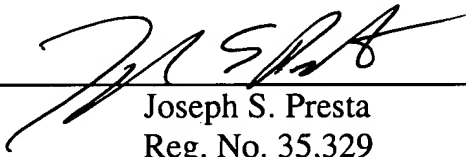
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Should the Examiner have any questions regarding this response, or deem that any

further issues need to be addressed prior to allowance, the Examiner is invited to call the

undersigned attorney at the phone number below.

Respectfully submitted,

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